



South Carolina
DEPARTMENT OF CONSUMER AFFAIRS
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**PROTECTING CONSUMERS SINCE
 1975**

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May 18, 2021

VIA ELECTRONIC FILING

The Honorable Jocelyn Boyd
 Chief Clerk/Executive Director
 The Public Service Commission of South Carolina
 101 Executive Center Drive
 Columbia, South Carolina 29210

RE: Docket 2020-247-A
 Workshops Regarding the Public Service Commission's Formal Review of Its
 Regulations Pursuant to S.C. Code Ann. Section 1-23-120(J)
Comments on Commission Notices Included in Customer Bill Inserts

Dear Ms. Boyd:

The Department of Consumer Affairs (the "Department") submits this letter in response to the Commission's request for comments on customer bill insert notices. In addition, we plan to participate in the May 28, 2021 workshop.

On March 9th, the Department submitted a comment letter in this docket regarding S.C. Code Ann. Regs. 103-500 and 700 *et seq.* The letter included comments on sections 103-532.1 and 103-732.2 (Customer Bill Forms). We recommended the Commission:

- 1) require font size to be no less than 12-point;
- 2) require headings to be in bold font; and
- 3) prohibit the use of full sentences in all capital letters ("all caps").

We further noted these recommendations are commonly cited as methods to increase ease of reader comprehension. Font size is particularly important for older consumers and those with sight issues. Bold font helps draw the reader's attention to important areas of a document. "All uppercase sentences usually bring the reader to a standstill because the shapes of words disappear, causing

the reader to slow down and study each letter. Ironically, readers tend to skip sentences written in all uppercase.” (for additional information, see [A Plain English Handbook: How to create clear SEC disclosure documents](#)).

We note AARP provided similar comments and recommendations in its letter filed on May 12, 2021. AARP additionally discussed measuring reading grade levels and page design elements that would improve readability and comprehension. We support each of AARP’s recommendations and strive to implement them in our own consumer outreach efforts.

At this time, the Department does not have any additional comments. However, we may submit reply comments in accordance with the Commission’s notices in this docket. We appreciate the Commission staff creating this additional workshop and look forward to discussing these important issues further.

Regards,

A handwritten signature in blue ink, appearing to read "Roger Hall".

Roger Hall, Esq.
Deputy Consumer Advocate